

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:2024-CR-8114-BER

UNITED STATES OF AMERICA

v.

ANDRE ALEXANDER PINO,

Defendant.

GOVERNMENT'S NOTICE OF APPEAL FROM MAGISTRATE'S ORDER DENYING
PRE-TRIAL DETENTION AND MOTION TO STAY BOND

The United States of America, by and through its undersigned Assistant United States Attorney, pursuant to local Magistrate's Rule 4(a)(2) hereby files this Motion to Stay Bond and Notice of Appeal from the Order entered by the United States Magistrate Judge on March 7, 2025, which denied the Government's request for pre-trial detention as to defendant, ANDRE ALEXANDER PINO, JR.

On February 26, 2025, a criminal complaint was filed charging the Defendant with Distribution of Child Pornography in violation of Title 18, United States Code, Sections 2252A(a)(2) & (b)(1). If convicted, the Defendant faces a 5-year mandatory minimum term of imprisonment up to a maximum of 20 years imprisonment.

The United States requested that the Defendant be detained pending trial in this case as a risk of nonappearance and a danger to the community, relying upon the rebuttable statutory presumption under Title 18, United States Code, Section 3142(e) because the charged offense involves minor victims.

On March 7, 2025, the Defendant appeared before United States Magistrate Bruce Reinhart for a pre-trial detention hearing. On that date, United States Magistrate Judge Reinhart denied the

Government's request for pre-trial detention and issued a personal surety bond with special conditions, to be cosigned by the defendant's girlfriend. Upon the Government's request, United States Magistrate Judge Reinhart stayed his release order to allow the Government to perfect its appeal of this order. The United States has ordered an expedited transcript of the pre-trial detention hearing and will be filing a Motion for Revocation of the Release Order pursuant to Title 18, United States Code, Section 3145 upon receipt of the transcript.

Therefore, the United States respectfully moves this Honorable Court to stay the order setting bond until further order of this Court.

Respectfully submitted,

HAYDEN P. O'BYRNE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 10, 2025, I filed the foregoing document with the Clerk of the Court using CM/ECF and sent a copy of the document via email to **Scott G. Berry**, attorney for Defendant.

s/ Justin Chapman
Justin Chapman
Assistant United States Attorney